

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56(a), and for the reasons set forth in the accompanying Memorandum in Support, Plaintiffs respectfully move the Court to grant summary judgment for Plaintiffs, holding that Plaintiffs have established as a matter of law that:

- Plaintiffs own, or have an exclusive license to, the rights under the Copyright Act to reproduce and distribute each of the copyrighted works identified in the Appendices to their respective declarations submitted in support of the Motion (“Plaintiffs’ Works”);
- Cox users directly infringed Plaintiffs’ Works;
- Cox is liable for contributory infringement of Plaintiffs’ Works; and
- Cox is liable for vicarious infringement of Plaintiffs’ Works.

Dated: August 30, 2019

Respectfully submitted,

/s/ Scott A. Zebrak

Scott A. Zebrak (38729)
Matthew J. Oppenheim (*pro hac vice*)
Jeffrey M. Gould (*pro hac vice*)
OPPENHEIM + ZEBRAK, LLP
5225 Wisconsin Avenue, NW, Suite 503
Washington, DC 20015
Tel: 202-480-2999
scott@oandzlaw.com
matt@oandzlaw.com
jeff@oandzlaw.com

Attorneys for Plaintiffs